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*Attorneys for Defendant
Organo Gold Enterprises, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JAMES D. NOLAND JR., a Nevada resident,

Plaintiff,

v.

ORGANO GOLD INTERNATIONAL, INC.,
a Nevada corporation; ORGANO GOLD
ENTERPRISES, INC., a British Columbia,
Canada corporation; HOLTON BUGGS JR.
and JANE DOE BUGGS, Texas residents;
BERNARDO CHUA, a British Columbia,
Canada resident; SHANE MORAND, an
Ontario, Canada resident; and JAMIE FOO, a
British Columbia, Canada resident,

Defendants.

Case No. 2:18-cv-01275-JAD-CWH

**JOINT STIPULATION FOR 60-DAY
EXTENSION OF TIME TO FILE JOINT
PRE-TRIAL ORDER**

STIPULATION FOR 60-DAY EXTENSION OF TIME TO FILE THE JOINT PRE-TRIAL ORDER

Pursuant to Local Rule IA 6-1, Plaintiff James D. Noland, Jr. and Defendants Organo Gold Int'l, Inc., Organo Gold Enterprises, Inc., Holton V. Buggs, Jr. and Bernardo Chua, through their attorneys of record, stipulate to a 60-day extension of time to file the Joint Pre-Trial Order, and respectfully show as follows:

The deadline to file the joint pre-trial order is April 1, 2019. This is the first stipulation to extend time for filing the joint pre-trial order.

Plaintiff James D. Noland, Jr. moved on January 31, 2019 for a 60-day extension of the deadline to file the Joint Pre-Trial Order, among other deadlines, for the reasons set forth in his motion. *See* Doc. Nos. 110-112, and 115.

Defendants timely moved or joined motions for final summary judgment on November 20, 2018 (limitations) and on March 1, 2019 (no-evidence of predicate acts). *See* Doc. Nos. 82-84, 87, 94, 117, and 118. Defendants Holton and Earlene Buggs also have a pending Motion To Dismiss. *See* Doc. 80.

Good cause exists for extending the joint pre-trial order deadline. The foregoing motions all remain pending, and their disposition will affect the drafting of the joint pre-trial order and potentially the trial itself. Accordingly, the parties stipulate to a 60-day extension of the joint pre-trial order.

This stipulation is effective on the date it is signed by all parties and the Court.

APPROVED:

APPROVED:

LAW OFFICE OF DAVID G. EISENSTEIN

PARSONS BEHLE & LATIMER

/s/ David H. Eisenstein

/s/ Brook B. Bond

By: _____
David G. Eisenstein, Esq.

By: _____
Brook B. Bond, Esq.

Attorney for Plaintiff James D. Noland, Jr.

Attorney for Defendant Organo Gold Int'l, Inc.

1 APPROVED:

2 NICHAMOFF LAW, PC

3 /s/ Seth A. Nichamoff

4 By: _____
Seth A. Nichamoff, Esq.

5 *Attorney for Defendant Organo Gold*
6 *Enterprises, Inc.*

7 APPROVED:

8 JAMIE KING PC

9 /s/ Jamie King

10 By: _____
11 Jamie King, Esq.

12 *Attorney for Defendant Bernardo Chua*

APPROVED:

MOULTON WILSON & ARNEY LLP

/s/ Lance C. Arney

By: _____
Lance C. Arney, Esq.

Attorney for Defendant Holton V. Buggs,
Jr.

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15 IT IS SO ORDERED.

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17 _____
UNITED STATES MAGISTRATE JUDGE

18 Dated: March 13, 2019
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